

MARIO N. ALIOTO, ESQ. (56433)
LAUREN C. CAPURRO, ESQ. (241151)
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
2001 Union Street, Suite 482
San Francisco, CA 94123
Telephone: (415) 563-7200
Facsimile: (415) 346-0679
E-mail: malioto@tatp.com
lauren russell@tatp.com

Lead Counsel for the Indirect-Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE CATHODE RAY TUBE (CRT))	MDL NO. 1917
ANTITRUST LITIGATION)	
_____)	Case No. 07-cv-5944-JST
)	
This Document Relates to:)	DECLARATION OF GERARD A.
)	DEVER IN SUPPORT OF INDIRECT
Indirect Purchaser Class Action)	PURCHASER PLAINTIFFS' RESPONSE
)	TO IRICO DEFENDANTS' MOTION IN
)	LIMINE NO. 1
)	
)	Hearing Date: December 15, 2023
)	Time: 2:00 p.m.
)	Courtroom: 6, 2nd Floor
)	
_____)	The Honorable Jon S. Tigar

I, Gerard A. Dever, hereby declare and state as follows:

1. I am a member of the law firm Fine, Kaplan and Black, R.P.C., counsel for the Indirect Purchaser Plaintiffs in the above-captioned action currently pending in the U.S. District Court for the Northern District of California. I am a member in good standing of the bar of the Commonwealth of Pennsylvania and I am admitted *pro hac vice* to practice before this Court. I submit this Declaration in support of Plaintiffs' Response to Irico Defendants' Motion *In Limine* No. 1: to compel Plaintiffs to refer to Defendant Irico Group Corp. and Irico Display Devices Co., Ltd. as separate corporate entities.

2. Attached hereto as **Exhibit 1** is a true and correct copy of CHU00030769E-CHU00030770E, a certified English translation of CHU00030769-CHU00030770, which is a report from Jing-Song (Jason) Lu to CPTC Sales Department with the subject "IRICO (Irico) 14" CPT Sales Situation" dated May 24, 1999.

3. Attached here to as **Exhibit 2** is a true and correct copy of CHU00029110E-CHU00029115E, a certified English translation of CHU00029110-CHU00029115, which is a visitation report by Chunghwa's Wen-Chun (Tony) Cheng regarding his contacts with Philips on June 23, 2000 and with Irico on June 25, 2000.

4. Attached here to as **Exhibit 3** is a true and correct copy of SDCRT-0091524E-SDCRT-0091530E, a certified English translation of SDCRT-0091524-SDCRT-0091530, which is a Competitor China Visit Report regarding a meeting that took place on August 16-17 of 2005.

5. Attached here to as **Exhibit 4** is a true and correct copy of the Amended Declaration of Zhaojie Wang in Support of Irico Defendants' Motions to Dismiss for Lack of Jurisdiction.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on September 1, 2023, in Philadelphia, Pennsylvania.

1 Dated: September 1, 2023

By: /s/ Gerard A. Dever

2 Gerard A. Dever
3 Fine, Kaplan and Black, R.P.C.
4 One South Broad Street, 23rd Floor
Philadelphia, PA 19107
5 Telephone: (215) 567-6565
Facsimile: (215) 568-5872
6 Email: gdever@finekaplan.com

Counsel for Indirect Purchaser Plaintiffs